

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

RECEIVED

JUN 18 2018

SC Court of Appeals

Appeal Case No.: 2017-002145
Civil Case No.: 2016-CP-02350

Glenda R. Couram Appellant,

v.

Sherwood Tidwell Respondent.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellant Glenda Couram proposes the following to be included in the Record on Appeal:

1. Appellant's Summon and Complaint dated March 28, 2016
2. Defendants Answer dated May 10, 2016
3. Appellant filed Rule 59(c) Motion to Alter or Amend on or about June 26, 2016 with Memorandum of Support
4. Defendant Response to 59 Motion July 3, 2017
4. Order denying Motion dated October 14, 2017 Judge Newman
4. Plaintiff's Post Trial Motion Rule 60 filed on dated December 4, 2017, still pending in the lower court and Memorandum in Support
5. Email denying Plaintiff's filed Medical Records, bills, etc., from Judge.
6. Jury Verdict of June 16, 2017 in favor of Plaintiff
7. Plaintiff Motion for Full and/or Partial Summary Judgment Dated February 2016
8. Order Judge Hood, June 1, 2017 granting partial Summary Judgment in favor of Plaintiff – Hearing held April 27, 2017 - LIABILITY

9. Plaintiff's Motion to Quash dropped for Mental Health Records from Columbia Counseling Center April 27, 2017
10. Defendant, Subpoena's and Requests for Plaintiff's Medical Records from Blue Cross Blue Shield, Columbia Counseling Center, Palmetto Health Family Medicine (Parkridge Medical Associates, Palmetto Health Spine Center, Vital Energy Wellness and Rehab Center (Plaintiff received copies of all documents under discovery along with *Chain of Custodians of Record Affidavits signed by Custodians*).
11. Defendant's Subpoena's for Plaintiff Employment Records Custodian of Record signed by Gregory Torok, Director of SCDMV Human Resources 2017 the second request. The first request was made in 2016 Custodian of Record sent in 2016 after discussing with me signed by Ms. Mossell
12. Redacted Letters to Shurko and Peer
13. Responses Discovery and Interrogatories from Defendants
14. Medical Bills sent to Defendant and my Insurance company
15. Emails from Judge Newman
16. Emails from Attorney of Record Spitz during discovery and negotiations – featuring request for wages lost and time lost along with medicals submitted to Attorney
17. Transcript
18. Plaintiff's Trial Exhibits Photographs
19. Letters Redacted submitted with Motion to Reconsider and new trial
20. Medical Records submitted with Motion to Reconsider and new trial
21. Medical Bills submitted with Motion to Reconsider and new trial
22. Photograph of Plaintiff showing how she suffers during stressful situation and during trial developed fever blister
23. Defendant's Answers to Plaintiff's Interrogatories and Discovery dated
24. Police Report filed with Complaint March 28, 2016
25. Incomplete Medical bills filed with Complaint March 28, 2016
26. Letters dated March 28, 2016 filed with Complaint
27. Subrogation Letter Blue Cross Blue Shield Dated July 22, 2016
28. Medical Bill Palmetto Spine Center Dated
29. Affidavit of Custodian of Records – SC Blue Cross Blue Shield signed by Denise D. Medders – Notarized
30. Lower Court Jury Instructions
31. Letters (Exhibits) authorized by Appellant w/ Medical Bills itemized Attached
32. Letter from Employer Payroll Maggie P Wilson dated May 23, 2016 sent to Defendant Attorney at her request, Letter prior to this dated beginning October 19, 2015 was also sent to the Attorney and Defendant's Insurer – Adjuster Tracy Peer at their request
33. Medical Bills from Blue Cross Blue Shield printed from Website with password Access dated from October 15, 2015 to December 28, 2016 supplied to Defendant's Attorney
34. Emails Judge Benjamin and Newman
35. Consent Order dated September 2, 2016 removing Nationwide and Titan Indemnity signed by Appellant and Defendant's Attorney Spitz

36. Letter authored by Appellant Offered for redaction and submission dated June 8, 2016 to prior Defense Attorney Anna Wade Sumner, with Medical Bills itemized and description of events leading to Accident and resulting damages – offered for redaction
37. Exhibit Medical Records from Vital Energy emailed by Sunshine Cobb - to Defendant's Attorney dated and signed by Marshal Edrada, License #2878 along with final Medical Bill
38. Palmetto Health Spine Center, Records sent by Custodian of Record "certified as kept in the normal course of business at the Palmetto Health Spine Center Office – signed by Manager – dated January 16, 2017.
39. Email of latest Medicals Bills Itemized sent to Defendant's Attorney Spitz and Appellant's Insurance Company dated November 30, 2016 – covering 10/2016 to 11/2016. (Final as it turned out Appellant lost her job on April 3, 2017).
40. Blue Cross Blue Shield of South Carolina Subrogation Letter dated July 22, 2016, signed by Latisha Billingsley – Vital Energy from September 23, 2016 until May 20, 2015, showing total cost for treatment as \$10, 447 from Vital Energy, Parkridge Medical Associates and Lexington Urgent Care Only¹
41. Copy of CD of Medical Records from Parkridge Medical Associates w/Chain of Custody

I certify that this proposed designation contains no matters which are irrelevant to this appeal.



Glenda Couram
104 Macaw Lane
Lexington, South Carolina 29073
Telephone (803) 896-7509
Pro se Appellant

June 10, 2018

¹ Did not show the bills from Palmetto Spine Center or Baptist Medical were two sets of x-rays were order by Dr. Birdsong.

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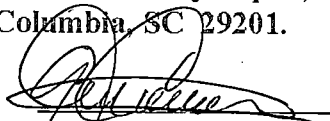
Glenda R. Couram Appellant,

v.

Sherwood Tidwell Respondent.

AMENDED PROOF OF SERVICE

I certify that I have served the Appellant's Amended Initial Brief and Designation of Matter on Sherwood Tidwell by depositing a copy of it in the United States Mail, postage prepaid, on June 18, 2018, addressed to his attorney of record Jocelyn Spitz, Esquire, Clawson and Staubes, 1612 Marion Street, Ste., 200, Columbia, SC 29201.


Glenda Couram
104 Macaw Lane
Lexington, SC 29073
(803) 358-0127
Pro se Appellant

June 18, 2018

June ¹⁸~~20~~, 2018

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201


RE: Couram v Tidwell
Appellant Case No.: 2017-002145

Dear Ms. Kitchings:

Enclosed please find Appellant's AMENDED Initial Brief and Proposed Designation of Matter to be Included in the Record on Appeal in the aforementioned matter. I am, by copy of this letter, serving a copy on Respondents. I am filing this in compliance with letter from this court dated June 12, 2018 to correct the number of pages to 50.

Thank if you should have any questions please contact me.

Sincerely,



Glenda Couram

104 Macaw Lane
Lexington, SC 29073
803 358-0127
grcouram@hotmail.com

Enclosures

c: Jescelyn Spitz, Esq., Attorney for Tidwell

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